

ATTACHMENT B

AFFIDAVIT OF FEDERAL BUREAU OF INVESTIGATION
TASK FORCE OFFICER LEE WALKER

I, Lee Walker, Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), being duly sworn, do state the following:

1. I have been employed as a police officer with the City of Springfield, Missouri, since 2004. I am currently a TFO with the FBI, as well as a member of the Southwest Missouri Cyber Crimes Task Force (SMCCTF) in Joplin, Missouri. As a TFO, I have been assigned to investigate computer crimes, including violations against children. I have gained expertise in the conduct of such investigations through training in seminars, classes, and everyday work related to conducting these types of investigations. I have attended training provided by the Missouri Internet Crimes Against Children (ICAC) Task Force. I have written, executed, and assisted in over 100 search warrants on the state and federal level. As a TFO with the FBI, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I have received training in the area of child pornography and child exploitation and have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. This affidavit is submitted in support of a criminal complaint charging Jeffery Scott SALT KILL with violation of Title 18, United States Code, Sections 2251(a) and 2251(e), Sexual Exploitation of Children.

3. The statements in this affidavit are based on my personal observations, my investigation of this matter and information obtained from other law enforcement officers and witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, this affiant has not included each and every fact known to me concerning this

investigation. Your affiant has set forth the facts necessary to establish probable cause to believe that Jeffrey Scott SALTKILL has violated 18 U.S.C. §§ 2251(a) and 2251(e), Sexual Exploitation of Children.

STATUTORY AUTHORITY

4. Title 18, United States Code, Section 2251(a) prohibits a person from employing, using, persuading, inducing, enticing or coercing a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce, or if such visual depiction actually was transported in or affecting interstate commerce.

DEFINITIONS

5. The following definitions apply to this Affidavit:
- a. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.
 - b. The term “sexually explicit conduct,” 18 U.S.C. § 2256(2)(A)(i-v), is defined as actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic areas of any person.

PROBABLE CAUSE

6. On January 11, 2022, the Lake St. Louis, Missouri, Police Department (LPD) were notified by the Mille Lacs, Minnesota, Sheriff's Office that a minor victim in Minnesota was communicating with a person, likely in the Missouri area, named "Jaylin" at telephone number (417) 300-3275. LPD notified the St. Louis, Missouri, Division of the FBI.

7. On January 11, 2022, Special Agent (SA) Daniel Root spoke with A.W.M., the mother of the 11-year-old victim W.W.M. Both A.W.M. and W.W.M. reside in Minnesota. A.W.M. informed SA Root that she removed her daughter's phone from her possession when she became aware that W.W.M. was using the phone to communicate with older men she met on social networking sites.

8. A.W.M. stated that she reviewed the text messages in her daughter's phone and found communication between W.W.M. and an unknown person who used the name "Jaylin" and phone number (417) 300-3275. A.W.M. told SA Root that "Jaylin" sent an image of an erect penis to W.W.M., requested that W.W.M. send nude images of herself to him, and also indicated that he wanted to come to W.W.M.'s home and engage in sexual acts.

9. At SA Root's request, A.W.M. placed her daughter's cell phone in airplane mode and shipped it overnight to the St. Louis Division of the FBI.

10. On January 14, 2022, SA Root received W.W.M.'s cellular telephone and had the phone forensically analyzed. SA Root reviewed the contents of W.W.M.'s phone extraction and noted that W.W.M. had engaged in sexual conversation with two individuals. One was "Jaylin" at (417) 300-3275, and the other was listed as "Jason" in W.W.M.'s phone with a contact number of (660) 345-3685.

11. SA Root also located the conversations referenced by A.W.M. on W.W.M.'s device. The text message string started on January 8, 2022.

12. In the text message string, W.W.M. asked "Jaylin" how he got her information, to which he replied, "Got it frm [sic] omegle". This affiant is aware that Omegle is a website in which users are randomly connected with other video chat users around the world.

13. The following conversation took place on January 8, 2022:

"Jaylin": R you single

W.W.M.: Is 12 to young for u

"Jaylin": No it's not

...

"Jaylin": Yeah do you sext

...

W.W.M.: [Photograph of W.W.M.]

"Jaylin": Looks like u got big tits

...

W.W.M.: Ok so let's say we where dating what would u do if we where in bed

"Jaylin": Well I would lick ur pussy

W.W.M.: I uhh...

"Jaylin": Make u call me papi while u stroke me

W.W.M.:

W.W.M.: Would us do anything else

"Jaylin": Make u suck my 9inch cock like a good how u r

“Jaylin”: Stick my cock in ur tight 12yr old pussy

...

“Jaylin”: Ok i want u to be my gf

...

“Jaylin”: Why is ur friend contacting me Monday

“Jaylin”: They cops

“Jaylin”: No I need pic of something to

W.W.M.: No I will tell her everything is fine and she would have to talk to u.

The next day, January 9, 2022, “Jaylin” sent a photograph of an erect penis. The conversation continued as follows:

“Jaylin”: Yeah one day I’ll come to Minnesota.

...

“Jaylin”: I could come in a month up there

W.W.M.: Yea I would not give a shit

“Jaylin”: Ok I wlld bring my 3 friends to

W.W.M.: Ok.... [kiss emoji]

W.W.M.: But u do know that I am still with my parents right

“Jaylin”: And we all put our dicks in ur holes at once

“Jaylin”: Yeah I know u cld sneak out

W.W.M.: Yea but then where would we go

“Jaylin”: to a park or wooded area

W.W.M.: Oh ok

“Jaylin”: Just have sex with u

...

"Jaylin": U want to b fucked by my friend's

...

14. After this exchange, W.W.M. provided "Jaylin" with the name of her town and the name of the middle school that she attends. "Jaylin" responded, "Ok got it written down" and "Ok u wld have to be quite cuz not coming directly to ur house be down the street[.]"

15. It was at this point in the conversation that the phone was taken from W.W.M. and sent to the FBI. An authorized FBI undercover agent re-engaged with "Jaylin" using the persona of W.W.M.

16. On January 14, 2021, the FBI undercover (UC) responded to the text string with "ok." "Jaylin" responded on the same day at 1548 hours, "Hi," "I'm in [W.W.M.'s hometown] since yesterday." The FBI UC told "Jaylin" that there was a family emergency and that W.W.M. and her mother were no longer in their hometown. The FBI UC and "Jaylin" continued to communicate using W.W.M.'s device.

17. Throughout the communication between "Jaylin" and the FBI UC posing as W.W.M., "Jaylin" instructed "W.W.M." to masturbate, view pornography, and sent her links to videos of adult pornography. "Jaylin" also told "W.W.M.", to engage in acts of bestiality, and encouraged her to perform fellatio on a dog. On January 15, 2022, "Jaylin" sends a message to "W.W.M." saying, "I wanna See ur pussy."

18. On January 17, 2022, the following messages were exchanged between "Jaylin" and undercover agent posing as "W.W.M.":

"Jaylin": I wanna hear u finger

"W.W.M.": Oh yeah daddy

“W.W.M.”: If I have my phone I’ll have my camera too

“Jaylin”: Yeah an I can watch u finger it

“Jaylin”: U can watch me stroke it an cum

“Jaylin”: Maybe I will show me ur pussy

“Jaylin”: I’m stroking now

19. On January 24, 2022, the FBI UC was conversing with “Jaylin” at (417) 300-3275. At 1044 hours, “Jaylin” sent an image of an erect penis. Then, at 1200 hours, “Jason” at (660) 345-3685, sent five images of erect penises. One of the images was identical to an image that “Jaylin” at (417) 300-3275 sent to the FBI UC on January 17, 2022.

20. SA Root served subpoenas to the providers for the phone numbers of both subjects, “Jaylin” and “Jason”, with whom W.W.M. had sexual conversations.

21. On January 14, 2021, Verizon responded that they did not have subscriber data for (417) 300-3275, the number W.W.M. was communicating with “Jaylin” on, as it was a Tracfone prepaid line.

22. On December 18, 2021, TextNow responded to a FBI subpoena and provided call and text records for (660) 345-3685, the number W.W.M. used to communicate with “Jason.”

23. A review of the historical call detail records provided by TextNow showed that on December 26, 2021, at 04:36:27 hours, (660) 345-3685 (“Jason”) sent a text message to (417) 300-3275 (“Jaylin”).

24. At that point, it was not clear how “Jason” and “Jaylin” knew each other, or if they were in fact the same person, as this affiant knows, based on his training and experience, that people who commit child exploitation offenses often use multiple online personas.

25. The TextNow data indicated that the (660) 345-3685 phone number only accessed IP address 99.122.81.237, a residential AT&T IP address.

26. On January 18, 2022, SA Root issued a subpoena to AT&T for subscriber information for IP address 99.122.81.237. AT&T responded on January 22, 2022. The subscriber was listed as David WHEELER, 2956 East Stanford Street, Apartment #206, Springfield, Missouri 65804-2072.

27. On January 20, 2022, SA Root obtained a precision location warrant (PLW), a sealed warrant, in the Eastern District of Missouri, for prospective location data of the handset using number (417) 300-3275 ("Jaylin").

28. The data received from the PLW indicates that the user of (417) 300-3275 ("Jaylin") was in Springfield, Missouri, as recently as February 4, 2022. The most common point located on the PLW is a circle defined as being centered around latitude 37.175911, longitude - 93.236481, and with a diameter of 960 meters.

29. The address returned for IP address 99.122.81.237, used to access (660) 345-3685 ("Jason"), 2956 East Stanford Street, Springfield, Missouri, is within the circle described above.

30. Based on this information, as well as the precision location data, it is likely that "Jason" and "Jaylin" are the same person, and resides at 2956 East Stanford Street, Apartment #206, Springfield, Missouri 65804, within the Western District of Missouri.

31. On February 2, 2022, this affiant conducted limited surveillance at the 2956 East Stanford Street. The mailboxes for each apartment within the building were located on the first floor. This affiant observed the mailbox associated with Apartment #206 displayed the names "David Wheeler" and "Samantha Saltkill."

32. Based on the investigation, this affiant obtained a federal search warrant for 2956 East Stanford Street, Apartment #206, Springfield, Missouri. This warrant was executed by this affiant and other members of the SMCCTF on February 15, 2022.

33. During the execution of the search warrant, this affiant contacted and interviewed David Wheeler and Samantha Saltkill. Both claimed to have no knowledge of these communications with W.W.M. Meanwhile Springfield Police Department (SPD) Computer Forensics Analyst (CFA) Michael Costello examined devices found on the premise belonging to David and Samantha and did not locate any evidence of child sexual abuse material or child exploitation.

34. Further interviews of David and Samantha revealed that Samantha's parents, Tim and Shawnda Saltkill, and Samantha's uncle, Jeffrey SALT KILL, lived in Apartment #207 next door, and used the AT&T wireless Internet access (WiFi) that was in David's name.

35. This affiant contacted SALT KILL in Apartment #207. While obtaining pedigree information, SALT KILL provided a phone number of (417) 300-3275, which matched the Tracfone phone number associated with "Jaylin" and which was persistently pinging at the apartment building according to the PLW.

36. This affiant continued to interview SALT KILL in a recorded post-*Miranda* interview. SALT KILL admitted that he used the online service Omegle to contact a girl he believed was 14 years old. She posted her phone number on the Omegle service and he began texting her in early January and they communicated throughout most of January. He told her he was 16 years old. They continued to have sexual conversations. The girl would send him images of her chest, vagina, and feet, while he sent images of penises he found on the Internet, then claimed they were images of himself. He said he never sent actual images of himself. They

discussed him traveling to meet, however, SALTKILL claimed he did not have the means to travel and that was just fantasy talk.

37. SALTKILL explained he was addicted to communicating with children and obtaining sexual images. He said he has had sexual communications similar to this with approximately four to five additional minors within the last two years. He said he did not know their real names, nor where they actually lived. He explained that he has been single and lonely since he turned 30 and that he cannot meet an adult woman who is interested in dating. He indicated he has sexual communications with minors online and by text out of loneliness and desperation.

38. This affiant provided SALTKILL with a partial text log of the conversations preserved by SA Root. SALTKILL confirmed these were his texts. He said he used the name "Jason" and "Jaylin." He also confirmed he used a TextNow phone number, as well as his own phone number to text the minor victim.

39. SALTKILL said he deleted child pornography photos from his phone once he saw law enforcement approach and detain David Wheeler. He said he merely deleted them from his gallery application and did not remove them from the deleted folder. He had also uninstalled the TextNow application from his phone when he saw the officers arrive.

40. SALTKILL provided consent to search his bedroom within Apartment #207 for devices and to search those devices. He provided swipe codes for two phones found in his room. CFA Costello has found images of apparent child pornography of one female victim, however his forensic analysis is ongoing at the time of this writing.

CONCLUSION

18. Based upon the above facts, this affiant believes there is probable cause in support of a criminal complaint against Jeffrey Scott SALTKILL for violation Title 18, United States Code, Section 2251, that is, Sexual Exploitation of Children.



LEE WALKER
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me via telephone this 16th day of February, 2022.



HONORABLE DAVID P. RUSH
Chief United States Magistrate Judge
Western District of Missouri